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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 03/14/2022

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March 14, 2022

**MEMO ENDORSED**

**By ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Michael Kane, et al. v. Bill de Blasio, et al.* 21-cv-7863 (VEC)  
*Matthew Keil, et al. v. The City of New York, et al.* 21-cv-8773 (VEC)

Dear Judge Caproni:

We represent the Plaintiffs in the above-referenced cases. We write to respectfully request an extension of time for the Plaintiffs to file their opposition to the Defendants' motion to dismiss the Amended Complaint, which is currently due on March 16, 2022. Attorney Barry Black, counsel for the *Keil* Plaintiffs, had an unexpected family emergency today. Plaintiffs require additional time to file their opposition.

This is the Plaintiffs' first request for an extension of time. Assistant Corporation Counsel Jessica Giambrone has consented to our request on behalf of the Defendants. We respectfully ask the Court to extend the time for the Plaintiffs to submit their opposition to Wednesday, March 30, 2022 and Defendants' reply papers, if any, to Friday, April 15, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Sujata S. Gibson  
Counsel for Plaintiffs

/s/ Barry Black  
Counsel for Plaintiffs

cc: Counsel of Record (via ECF)

Application GRANTED. Plaintiffs' response in opposition to the motion to dismiss is due no later than **Wednesday, March 30, 2022** and Defendants' reply in support of their motion is due no later than **Friday, April 15, 2022**.

SO ORDERED.



Date: March 14, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE